



## The Art of Sustainability Limited Data Protection Policy

### **Policy Statement**

The Art of Sustainability Limited intends to fully comply with all requirements of the Data Protection Bill/GDPR in so far as it affects The Art of Sustainability Limited's activities.

### **Scope**

This Data Protection Policy:

- Covers the processing of all personal information whose use is controlled by The Art of Sustainability Limited and defined in The Art of Sustainability Limited's Data Protection Notification
- Covers all personal information handled, stored, processed or shared by The Art of Sustainability Limited whether organised and stored in physical or IT based record systems

### **Introduction**

The Art of Sustainability Limited collects personal data from those consenting to give in order to send email updates containing upcoming events.

In collecting and using this data, The Art of Sustainability Limited is committed to protecting an individual's right to privacy with regard to the processing of personal data and this policy has been implemented to support this commitment. The Art of Sustainability Limited must comply with the Bill/GDPR.

The Bill/GDPR governs the collection, holding, processing and retention of all personal data relating to living individuals. Its purpose being to ensure that those organisations and individuals, who collect, store and use that data do not abuse it, and process the data in accordance with the following eight Data Protection Principles that personal data shall:

- i) be processed fairly and lawfully and shall not be processed unless certain conditions are met
- ii) be obtained only for specified and lawful purposes and shall not be processed in any manner incompatible with those purposes
- iii) be adequate, relevant and not excessive for those purposes
- iv) be accurate and kept up to date
- v) not be kept for longer than is necessary for those purposes
- vi) be processed in accordance with the data subject's rights under the Bill/GDPR
- vii) be kept safe from unauthorized access, accidental loss or destruction
- viii) not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data

As stated, ***the Bill/GDPR covers all personal data that is held electronically, including databases, email and the Internet as well as some paper records.*** The paper records that are subject to the

Bill/GDPR are those that are contained in a relevant filing system where the data is organised and structured.

## **Policy Statements**

### **1. Responsibilities**

The legal responsibility for compliance with the Bill/GDPR lies with The Art of Sustainability Limited who is the data controller under the Bill/GDPR and is registered as such with the Information Commissioner's Office: Security number: CSN9584134. Responsibility for compliance is delegated to the Director who is responsible for encouraging data processing best practice within The Art of Sustainability Limited. However, compliance with this policy and the Bill/GDPR is the responsibility of everyone within The Art of Sustainability Limited who processes personal information.

### **2. Individual Consent**

In most cases, The Art of Sustainability Limited can only process personal data with the consent of the individual whom the data concerns. If the information is sensitive personal data, explicit consent may be needed.

### **3. Data Security**

The Art of Sustainability Limited must ensure that any personal information which they hold is kept securely and that they take appropriate security precautions by seeking to ensure the following:

- Source documents kept in a lockable cabinet or drawer or room
- Computerised data is password protected
- Data kept on discs or data storage devices are stored securely and encrypted
- Ensure individual passwords are kept confidential and are not disclosed to other personnel enabling log-in under another individual's personal username and password
- Logged on PCs are not left unattended where data is visible on screen to unauthorised personnel
- Screensavers are used at all times
- Paper-based records must never be left where unauthorised personnel can read or gain access to them
- When manual records are no longer required, they should be shredded or bagged and disposed of securely, and the hard drives of redundant PCs should be wiped clean

### **4. Rights of Individuals**

Under the Act, an individual has the following rights:

- i. To request access to information held about them, the purpose for which the information is being used and those to whom it is, has or can be disclosed to
- ii. To prevent data processing that is likely to cause distress or damage
- iii. To prevent data processing for direct marketing reasons
- iv. To be informed about the reasons behind any automatic decision made
- v. To seek compensation if they suffer damage as a result of any breach of the Bill/GDPR by the Data Controller
- vi. To take action to stop the use of, rectify, erase, or dispose of inaccurate information
- vii. To ask the Information Commissioner to assess if any Personal Data processing has not been followed in accordance with the Bill/GDPR

## **5. Access to Personal Data**

Subject to exemptions, the Bill/GDPR gives any individual who has personal data kept about them at The Art of Sustainability Limited the right to request in writing a copy of the information held relating to the individual in electronic format and also in some manual filing systems. Any person who wants to exercise this right should in the first instance make a written request to The Art of Sustainability Limited. The Art of Sustainability Limited will make an administrative charge of £10 each time that a request is made.

After receipt of a written request, the fee and any information needed as proof of identity of the person making the request, The Art of Sustainability Limited will ensure that the individual receives access within 40 calendar days, unless there is a valid reason for delay or an exemption is applicable.

The Bill/GDPR does not prevent an individual making a subject access request via a third party, including by a solicitor acting on behalf of a client. In these cases and prior to the disclosure of any personal information, The Art of Sustainability Limited would need to be satisfied that the third party making the request is entitled to act on behalf of the individual and would require evidence of this entitlement.

Whilst the Bill/GDPR does not limit the number of subject access requests an individual can make to any organisation, The Art of Sustainability Limited is not obliged to comply with an identical or similar request to one already dealt with, unless a reasonable interval has elapsed between the first request and any subsequent ones.

## **6. Direct Marketing (the communication by whatever means of any advertising or marketing material which is directed to individuals)**

Under the Bill/GDPR an individual has the right to prevent his/her personal data being processed for direct marketing. An individual can, at any time, give written notice to stop (or not begin) using their personal data for direct marketing. Any individual can exercise this right, and if The Art of Sustainability Limited receives a notice then it must comply within a reasonable period.

Any marketing campaign should be permission-based with a clear explanation of what an individual's details will be used for and a simple way should be included for an individual to opt out of marketing message.

## **7. Retention and Disposal of Data**

The Art of Sustainability Limited is not permitted to keep personal information for longer than is required for its purpose. However, some data will be kept longer or in perpetuity to comply with statutory or funding body requirements.

Personal and confidential information will be disposed of by means that protect the rights of those individuals i.e. shredding, disposal of confidential waste, secure electronic deletion.

## **8. Our service partners**

We may use the following third-party service providers named below to process and store your data:

Mailchimp (The Rocket Science Group, LLC), which we use to manage email marketing subscriber lists and send emails to our subscribers. Read their privacy policy

Google LLC, which provides our email service. We also use Google Analytics service to measure the performance of this website and their G

Reg 123 which hosts this website.

Automattic, Inc., whose WordPress software (and associated add-ons) we use to manage the content of this website

<https://ibericode.com/> plugin Mailchimp for Wordpress links the website to Mailchimp

## **9. Complaints**

The Art of Sustainability Limited is dedicated to being compliant with the Bill/GDPR. In the first instance, contact the following member of staff who as The Art of Sustainability Limited's Data Protection Officer will aim to resolve any issue: Steven England, The Art of Sustainability, The Nurtons, Tintern, NP16 7NX

### **Location, access and dissemination of the Policy**

Overall responsibility for the policy implementation rests with The Art of Sustainability Limited Director.

For useful information and advice on data protection contact: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Tel: 0303 123 1113

Internet: [www.ico.gov.uk](http://www.ico.gov.uk)